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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

In Re:	§	
Percy Garland Rainey, Jr.	§	Case No. 09-70650-hdh-13
Carol Ann Rainey	§	Chapter 13
Debtor	§	

DEBTORS' MOTION TO EXTEND AUTOMATIC STAY

Comes Now Debtor, by counsel, and for this Motion state as follows:

1. Debtor filed for relief under Chapter 13 in the Northern District of Texas. This is a core proceeding.
2. Debtor was a debtor in a prior case during the preceding year. To-wit: Chapter 13, Case No. 08-70267-HDH-13 filed on 7/8/2008.
3. Debtor seeks an extension of the automatic stay imposed for 30-days pursuant to 11 U.S.C. §362(c)(3)(A), as to all creditors until further order or discharge to effectuate an orderly reorganization, pursuant to 11 U.S.C. §362(c)(3)(B).
4. Debtor's prior case was dismissed for: Debtor's payment increased beyond what was feasible for his household income. He had not been consistently employed at the time of filing his prior case. therefore he was unable to make the payment. .
5. The following changes of circumstances demonstrate that the Debtor can perform this plan and are likely to complete the case successfully: Debtor's payment is reduced and he has been consistently employed for over a year. The current plan payment is more feasible. The payment will be deducted from his bi-weekly pay check.

WHEREFORE, Debtor requests this Court enter its order continuing the automatic stay under §362(a) in this proceeding as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under §362(c)(1) or (c)(2) or a motion for relief is granted under §362(d).

Respectfully submitted,

/s/Monte J. White
Attorney for Debtor

CERTIFICATE OF SERVICE

A true and exact copy of the foregoing Motion and Notice of Hearing was served electronically by the ECF System or by First Class Mail on December 23, 2009, on all parties on the mailing matrix:

/s/Monte J. White
Attorney for Debtor

ACE Cash Express
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Wichita Falls, TX 76308

Check N Go of Texas
Attn Chrystal-Manager
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Wichita Falls, TX 76308

Kell West Regional Hospital
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Wichita Falls, TX 76310

Afni, Inc./Sprint PCS
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City of Burk/Wichita County
c/o Harold Lerew
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Wichita Falls, TX 76307

Merrick Bank Corporation
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Draper, UT 84020

American Servicing Co
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Carol Stream, IL 60197

Reliant Energy
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Cbc/financial Credit N/AT&T SWB
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Rjm Acq LLC/Crossings Book Club
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Syosset, NY 11791

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Rjm Acq LLC/Quality Paperback B West Asset/Medical Center of Ar
575 Underhill Blvd Ste 2 2703 N Highway 75
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RJM Acq LLC/The Good Cook Book Williams & Fudge Inc/Art Instit
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